

REMARKS

At the outset, the Examiner is thanked for the thorough consideration given the subject application. Claims 1-21 are currently pending in this application. Claim 1 has been amended. Reconsideration and reexamination are respectfully requested.

The Examiner rejected claims 2, 3, 11, and 16-21 under 35 USC § 112, second paragraph as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. Applicant respectfully traverses this rejection.

With regards to claims 2, 16, and 18, Applicant is confused as to how the Examiner's alternative interpretation of the word "coplanar" is different. The word "coplanar" should be given its usual and widely accepted meaning.

With regards to Claim 11, the term "substantially" is often used in conjunction with another term to describe a particular characteristic of the claimed invention. *In re Nehrenberg*, 280 F.2d 161, 126 USPQ 383 (CCPA 1960). In this context, the term "substantially" is used to describe the portion of the chip carrier that is received by the chip carrier.

Applicant submits that all of the claims comply with 35 USC § 112. Applicant respectfully requests that the rejection under 35 USC § 112 be withdrawn.

The Examiner rejected claims 1-3 and 11-19 under 35 USC § 102(b) as being anticipated by Janko (US Patent No. 5,015,946). Applicant respectfully traverses this rejection.

Claim 1 is allowable at least for the reason that claim 1 recites a combination of elements including an RF interconnect structure including a plurality of pins extending from the flange. None of the cited references teaches or suggests each and every feature of the claims.

Janko discloses a high density probe for probing an integrated circuit package. Janko does not teach a connector assembly for a radio frequency (RF) signal. Applicant respectfully requests that the rejection under 35 USC § 102(b) be withdrawn.

Moreover, claims 2, 3, and 11-19 are allowable by virtue of their dependence on

claim 1, which is believed to be allowable.

The Examiner rejected claims 4-10, 20, and 21 under 35 USC § 103(a) as being unpatentable over Janko (US Patent No. 5,015,946). Applicant respectfully traverses this rejection.

As discussed above, Janko does not teach a connector assembly for a radio frequency (RF) signal and is thus, non-analogous art.

Janko does not teach or suggest the claimed invention as a whole. *Stratoflex, Inc. v. Aeroquip Corp.*, 713 F.2d 1530, 218 USPQ 871 (Fed. Cir. 1983); *Schenck v. Nortron Corp.*, 713 F.2d 782, 218 USPQ 698 (Fed. Cir. 1983); see also *In re Hirao*, 535 F.2d 67, 190 USPQ 15 (CCPA 1976). The invention of this application comprises a connector assembly for an RF signal. Janko may teach an assembly that includes a plurality of pins using specific processes and specific apparatuses, but fails to teach or suggest explicitly or implicitly an RF interconnect structure including a plurality of pins extending from the flange as recited by claim 1.

Further, the Applicant has discovered through experimentation an RF connector that substantially provides a constant AC return path and ensures signal integrity at high frequencies including at 50 GHz and above using the claimed assembly. Applicant has discovered the source of a problem and through experimentation, has identified a solution. Janko is not attempting to solve similar problems with the same solution. "[A] patentable invention may lie in the discovery of the source of a problem even though the remedy may be obvious once the source of the problem is identified. This is part of the 'subject matter as a whole', which should always be considered in determining the obviousness of an invention under 35 U.S.C. § 103." *In re Sponnoble*, 405 F.2d 578, 585, 160 USPQ 237, 243 (CCPA 1969). However, "discovery of the cause of a problem . . . does not always result in a patentable invention. . . . [A] different situation exists where the solution is obvious from prior art which contains the same solution for a similar problem." *In re Wiseman*, 596 F.2d 1019, 1022, 201 USPQ 658, 661 (CCPA 1979) (emphasis in original).

Applicant respectfully submits that no proper motivation or suggestion is found for one of ordinary skill in the art to modify Janko to arrive at the claimed signal path and

conductive line. Further, such modification is suggested only by the claimed invention, which is considered impermissible hindsight reconstruction.

Applicant submits that the Examiner has failed to establish a *prima facie* case of obviousness. Applicant respectfully requests that the rejection under 35 USC § 103(a) be withdrawn.

Attached hereto is a marked-up version of the changes made to the claims by the current amendment. The attached page is captioned **"Version with markings to show changes made."**

In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to withdraw the outstanding rejection of the claims and to pass this application to issue.

Applicants believe the foregoing amendments place the application in condition for allowance and early, favorable action is respectfully solicited. Should the Examiner deem that a telephone conference would further the prosecution of this application, the Examiner is invited to call the undersigned attorney at (202) 496-7371.

If these papers are not considered timely filed by the Patent and Trademark Office, then a petition is hereby made under 37 C.F.R. §1.136. Please credit any overpayment to deposit Account No. 50-0911.

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Respectfully submitted,

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Version With Markings to Show Changes Made

In the Claims

Please amend the claims as follows:

1. (Amended) A connector assembly for a radio frequency (RF) signal comprising:
a body;
a flange connected to the body and having a cavity; and
an RF interconnect structure including a plurality of pins extending from the flange,
wherein the cavity of the flange receives a chip carrier and the pins contact the chip
carrier.